

REMARKS

Claims 14-24 were previously pending in the application. By the Amendment, claim 24 is currently amended. Claims 14-23 remain unchanged. Reconsideration in view of the above amendments and the following remarks is respectfully requested.

Entry of this Amendment is proper under 37 C.F.R. §1.116 because the Amendment: (a) places the application in condition for allowance for the reasons discussed herein; (b) does not raise any new issues requiring further search and/or consideration (since the amendments amplify issues previously discussed throughout prosecution and raised by the Examiner in the previous Office Action; (c) does not present any additional claims without canceling the corresponding number of finally-rejected claims; and (d) places the application in better form for appeal, should an appeal be necessary. The Amendment was necessary and was not earlier presented because it is made in response to arguments raised in the final rejection. Entry of the Amendment is thus respectfully requested.

The claims stand rejected over the prior art of record. In particular, claims 14, 15, 23 and 24 were rejected under 35 U.S.C. §102(b) as being anticipated by Mizumura (U.S. Published Patent Application No. 2004/0005815)*. Additionally, claims 14 and 24 were rejected under 35 U.S.C. §102(b) as being anticipated by Machado (U.S. Patent No. 6,764,321), and claims 14-24 were rejected under 35 U.S.C. §103(a) as being unpatentable over “Applicant’s Admitted Prior Art (AAPA)” in view of Machado.

* The Office Action refers to the Mizumura publication as “Judge et al.,” which appears to be an error.

Independent claim 14 recites a connector device for the production of an electrical connection between a mains cable and a cable harness in an electrical device, especially a household appliance. The device includes a first plug-in connector including connection elements coupleable to the cable harness. The connection elements effect a detachable mechanical and electrical connection between the first plug-in connector and the cable harness. The device also includes a second plug-in connector establishing a detachable mechanical and electrical connection to the mains cable, where the second plug-in connector is provided for a plurality of different mains cables and has an identical connector configuration for each of the different mains cables.

Independent claim 24 recites a connection system comprising a plurality of different mains cables each having a differently configured mains contact plug and a connector device for the production of an electrical connection between any of the plurality of mains cables and a cable harness in an electrical device. The connector device includes a first plug-in connector including connection elements coupleable to the cable harness, where the connection elements effect a detachable mechanical and electrical connection to the cable harness of the electrical device, and a second plug-in connector establishing a detachable mechanical and electrical connection to any of the mains cables. The second plug-in connector is provided for the plurality of different mains cables and has an identical connector configuration for each of the different mains cables. The plurality of mains cables have a corresponding connector contact plug with an identical configuration regardless of the design of the mains contact plug and comprise a cable harness whose plurality of electrical conductors can be connected to the connector device by means of a single plug-in contact connection.

Claims 14, 15, 23 and 24 are not unpatentable under 35 U.S.C. §102(b) as being anticipated by Mizumura.

The Mizumura publication relates to a backplane connector disposed between circuit boards that intersect each other at a right angle. In contrast with the claimed invention, no part of the connector is “coupleable to [a] cable harness,” nor is any part of the connector structured to effect “a detachable mechanical and electrical connection to [a] mains cable” as claimed. The Examiner disregards these features merely as statements of function. To the contrary, these features of the invention relate to important *structural* components of the invention and should not be ignored. Notwithstanding, according to the Federal Circuit, “the limitations which must be met by an anticipatory reference are those set forth in each statement of function Such a limitation cannot be met by an element in a reference that performs a different function, even though it may be part of a device embodying the same general overall concept.” See, e.g., *RCA Corp. v. Applied Digital Data Sys., Inc.*, 730 F.2d 1440 (Fed. Cir. 1984).

Moreover, claim 24 has been amended to clarify that the connection system includes a plurality of different mains cables each having a differently configured mains contact plug Additionally, claim 24 recites that the second plug-in connector establishes a detachable mechanical and electrical connection to any of the mains cables, where the second plug-in connector is provided for the plurality of different mains cables and has an identical connector configuration for each of the different mains cables. Moreover, each of the plurality of mains cables has a corresponding connector contact plug with an identical configuration regardless of the design of the mains contact plug Mizumura similarly lacks the plurality of different mains cables of the connection system as claimed.

With regard to dependent claims 15 and 23, Applicants submit that these claims are allowable at least by virtue of their dependency on an allowable independent claim and because they recite additional patentable subject matter.

Reconsideration and withdrawal of the rejection are respectfully requested.

Claims 14 and 24 are not unpatentable under 35 U.S.C. §102(b) as being anticipated by Machado.

Machado discloses a ground potential adaptor that enables live and neutral contacts of a supply outlet to be isolated from live and neutral contacts of an electrical device. According to Machado, the adaptor serves to earth the equipment through the earth connection of the mains cable and to isolate the mains voltage by severing connections to the live and neutral pins of the equipment plug. The connector device of the claimed invention, in contrast, facilitates a connection between a mains cable and an electrical device. Applicants thus submit that Machado lacks at least the claimed first plug-in connector including connection elements coupleable to the cable harness that effect a detachable mechanical and electrical connection between the first plug-in connector and the cable harness. Additionally, Machado lacks the claimed second plug-in connector establishing a detachable mechanical and electrical connection to the mains cable, where the second plug-in connector is provided for a plurality of different mains cables and has an identical connector configuration for each of the different mains cables.

In the "Response to Arguments" section on page 3 of the Office Action, the Office Action contends that the claims are "replete with functional language." As noted in the Amendment filed October 5, 2009, however, references to structural features "configured to" or "adapted to" have been deleted. Claim 14 now defines a first plug-in connector including connection elements that effect a mechanical and electrical connection between the first plug-in connector and the cable harness. Claim 14 also recites that the connector device includes a

second plug-in connector that establishes a detachable mechanical and electrical connection to the mains cable. Still further, claim 14 defines structure wherein the second plug-in connector has an identical connector configuration for each of a plurality of different mains cables. These structural features of the invention are neither vague nor functional and should not be ignored.

Claim 24 has been amended as discussed above including the plurality of mains cables and the connector device. The structure of the connector device is similar to that discussed above with regard to claim 14. This structure is also lacking in the Machado patent.

Reconsideration and withdrawal of the rejection are respectfully requested.

Claims 14-24 are not unpatentable under 35 U.S.C. §103(a) as being unpatentable over "Applicant's Admitted Prior Art (AAPA)" in view of Machado.

With regard to the AAPA in view of Machado, Applicants submit that the AAPA similarly lacks the structure of the connector device defined in claim 14 and of the connection system defined in claim 24. Rather, the AAPA describes the known connector device including a firm connection to a mains cable with electrical conductors crimped or welded to corresponding contacts of the connector device inside the mains connecting socket. The contact blades are used for electrical connection to a cable harness of the electrical appliance. The electrical connection between the mains connecting socket and the cable harness is made by means of single tab connectors. The hard connection to the mains cable requires that electrical appliances must be provided with a plurality of variants for different countries based on different contact plugs specific to different countries. In contrast, the connector device defined in claim 14 includes, among other things, a second plug-in connector that establishes a detachable mechanical and electrical connection to the mains cable, where the second plug-in connector is provided for a plurality of different mains cables and has an identical connector configuration for each of the different mains cables.

At least this structure is lacking in AAPA and Machado. Claim 24 defines a connection system including the connector device and a plurality of different mains cables each having a differently configured mains contact plug. This structure is also lacking in AAPA and Machado.

With regard to the dependent claims, Applicants submit that these claims are allowable at least by virtue of their dependency on an allowable independent claim and because they recite additional patentable subject matter. In this context, although the Office Action references “an interference suppression filter,” the Office Action fails to address the other structural details of the dependent claims. **In view of this shortcoming in the Office Action, Applicants submit that the finality of this Office Action is premature and should be withdrawn.**

Reconsideration and withdrawal of the rejection are respectfully requested.

CONCLUSION

In view of the above, entry of the present Amendment and allowance of Claims 14-24 are respectfully requested. If the Examiner has any questions regarding this amendment, the Examiner is requested to contact the undersigned. If an extension of time for this paper is required, petition for extension is herewith made.

Respectfully submitted,

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